

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF LOUISIANA  
ALEXANDRIA DIVISION

KAYLA J. GILES

CIVIL ACTION NO. 1:19-cv-01173

VERSUS

CHIEF JUDGE DEE D. DRELL

DELTA DEFENSE, L.L.C., and  
UNITED SPECIALTY INSURANCE COMPANY  
Defendants

MAGISTRATE JUDGE JOSEPH  
H.L. PEREZ-MONTES

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**JURISDICTIONAL MEMORANDUM IN ACCORDANCE WITH**  
**MEMORANDUM ORDER DATED OCTOBER 28, 2019**

MAY IT PLEASE THE COURT:

In accordance with the Memorandum Order of this Court dated October 28, 2019, plaintiff **KAYLA J. GILES** provides the Court with her understanding of the citizenship of the defendants to this action.

*United Specialty Insurance Company*

In Paragraph 4 of the Answer filed in this matter by United Specialty Insurance Company under the sub-heading Answer To Enumerated Allegations, it states that it is “a foreign insurer . . . is incorporated in the State of Delaware with its principal place of business in Texas. . .”

It did not respond to the single interrogatory with respect to jurisdiction propounded to it by plaintiff.

*Delta Defense, L.L.C.*

In Answer to the single interrogatory with respect to jurisdiction propounded to it by plaintiff, Delta Defense, LLC states that it is composed of two (2) members, and that both are residents of and domiciled in Wisconsin. This is filed in this court under Doc. 17.

*Summary*

Kayla J. Giles believes she has provided the Court with the requested information

concerning the jurisdiction of the court and believes this court has jurisdiction under 28 U.S.C. § 1332.

Respectfully Submitted,

**LAW OFFICE OF,**

**/S/ THOMAS R. WILLSON**  
**THOMAS R. WILLSON**  
**1330 JACKSON STREET**  
**ALEXANDRIA, LOUISIANA 71301**  
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**[rocky@rockywillsonlaw.com](mailto:rocky@rockywillsonlaw.com)**  
**Attorney for Kayla J. Giles (#13546)**

**Certificate of Service**

I hereby certify that a copy of this document is being provided to counsel for the named defendants, being W. Scarth Clark, Attorney for Delta Defense, L.L.C. via email and by depositing the same in the U.S. Mail with sufficient postage affixed addressed to him at 2030 St. Charles Avenue, New Orleans, La. 70130, and to Celeste D. Elliott, attorney for United Specialty Insurance Company, via email and by depositing the same in the U.S. Mail with sufficient postage affixed addressed to her at 601 Poydras Street, Suite 2775, New Orleans, La. 70130 on the 6<sup>th</sup> day of December, 2019.

**/S/ THOMAS R. WILLSON**  
**THOMAS R. WILLSON**